

Client Relationship Summary

30th June 2024

Introduction

James Hambro & Partners LLP ("JH&P") is regulated by the UK Financial Conduct Authority and registered with the US Securities and Exchange Commission ("SEC") as an investment advisor.

Free and simple tools are available to research firms and financial professionals at [Investor.gov](https://www.investor.gov)/CRS which also provides educational materials about broker- dealers, investment advisors and investing.

Relationships and Services

What investment services and advice can you provide me?

JH&P provides discretionary investment management services (referred to as 'Investment Advisory Services' by the SEC) to retail investors.

U.S. client portfolios are managed on a Discretionary basis. The Portfolio Manager has full discretion on which assets can be bought and sold within the portfolio, but this does not allow the Portfolio Manager to arrange the transfer of cash or assets from the portfolio without the underlying client's instruction. Our standard minimum requirement for retail investors is \$5m.

The JH&P Investment Process uses an automated system to highlight outliers within client portfolios across a number of different factors including risk and buy-list. Tolerances are set for each factor to identify outliers and to help Portfolio Managers manage client portfolios. The Head of Private Clients regularly monitors client portfolios to ensure they follow the JH&P Investment Process.

For additional information, please see Item 8 of our Form [ADV2A](#)

Given my financial situation, should I choose an investment advisory service? Why or why not?

A dedicated Portfolio Manager will construct and manage the portfolio of carefully researched investments. You will not be able to influence selection of the underlying investments except as specified in your mandate. If you want to select your own investments, this is not a suitable service for you. All investments carry risk and the value of an investment and the income from it can go down as well as up and investors may not get back the amount invested. This may be partly the result of exchange rate fluctuations in investments which have an exposure to foreign currencies. You should be aware that past performance is not a reliable indicator of future results. Tax benefits may vary as a result of statutory changes and their value will depend on individual circumstances. By spreading investments across a number of different asset classes, industry sectors and geographical regions, it is hoped that the risk of suffering an overall loss is reduced due to different investments performing in different ways. When investments perform in similar ways, such as all rising in value at the same time, this is known as correlation. Each investor should be mindful that taking on more risk may result in higher rewards, but also greater losses when markets are fluctuating.

It is important to remember that neither growth nor income is not guaranteed. The opportunity for the portfolio to make money is accompanied by the risk that it may not, and you may not get back the initial amount invested.

How will you choose investments to recommend to me?

We begin with a clear assessment of your investment objectives. This is an essential step which analyses your tolerance for risk, income requirements and other objectives. Once these are agreed, the investment objectives fall broadly into one of our long term mandates.

These mandates have varying asset allocations and range from lower expected return with a lower risk taken to higher expected return with a higher amount of risk taken. These mandates then provide a framework on which to base the client's portfolio.

What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

All staff hold relevant qualifications as required under UK regulation. The SEC does not have specific qualification requirements. We will provide you with a copy of our Form ADV 2B which details the experience of the Portfolio Managers. [ADV2B](#)

[Our Team | James Hambro](#)

Fees, Costs, Conflicts & Standard of Conduct

What fees will I pay?

You pay a management fee based on a percentage of assets under management, which includes the Research Fee. The fee is charged quarterly in arrears. Other costs, such as brokerage and other market charges will also be passed on to you. We do not charge a performance fee.

The typical annual investment management fee is based on a tiered scale of 1.0% on the first \$2,500,000, 0.8% on the next \$5m, 0.6% on the next \$10,000,000 and negotiable thereafter. A research fee of up to 0.05% is also charged. Fees are calculated quarterly in arrears on the last day of each quarter.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Prior to setting up an account with us you will be provided with detailed information regarding the costs and charges that will be levied both by us and by third parties, such as those who execute the investment transactions for your portfolio. If we pay or receive remuneration to or from another party in respect of your portfolio, we disclose this to you.

Description of other fees and costs

We will provide you with a copy of our Costs and Charges Disclosure report. This document sets out the estimated costs associated with the investment portfolio proposed by JH&P, and which is based on our assessment of your needs and circumstances. Please note that the costs stated can vary according to a broad variety of factors including the portfolio value, the level of transactional activity ("turnover") and the types of security transacted and held. Our portfolio managers will undertake transactions only where the potential benefit outweighs the costs incurred. A potential benefit can take many forms including crystallising profits, seeking better investment opportunities, managing risk, diversification and endeavouring to limit or avoid losses. For additional information, please see Item 5 of our Form [ADV2A](#)

Help me understand how these fees and costs might affect my investments. If I give you \$2,000,000 to invest, how much will go to fees and costs, and how much will be invested for me?

A \$2,000,000 portfolio with 25% turnover per annum paying 1.0% annual management fee would typically incur quarterly fees and third party costs of \$5,125 and \$250 respectively. Assuming the portfolio is valued at \$2,000,000 at the end of each quarter, this would represent typical annual fees and costs of \$21,500. Based on the same assumptions, for each \$10,000 increase in the value of the portfolio at the quarter end valuation point, the annual fees and costs would increase by \$108.

Note that turnover and third party costs are variable. Where the initial investment is in cash, the turnover in year 1 is likely to be closer to 100% which will increase the transaction costs.

Standard of Conduct

What are your legal obligations to me when acting as my investment adviser?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

How else does your firm make money and what conflicts of interest do you have?

JH&P does not believe that it has any material conflicts of interest with its U.S. clients. We do not receive any remuneration from any party other than you, and have no financial incentive to trade in your accounts more frequently than necessary. While we do charge a

management fee based on assets, that fee does reduce when assets exceed a specific threshold. increase. Like most firms, JH&P monitors for potential conflicts of interest related to our employees – these include giving and/or receiving gifts and entertainment, outside business activities of employees (such as being a director of another company or a charity) and personal securities transactions in equities that we may recommend for you.

How might your conflicts of interest affect me, and how will you address them?

While we take steps to ensure that our organisational and administrative arrangements are sufficient to prevent conflicts of interest, there are certain areas where a small residual risk may remain. These are set out within the Conflicts of Interest policy along with a description of the steps we take to mitigate the risk of the conflict impacting outcomes for our clients. For additional information, please see [Conflicts of Interest Disclosure | James Hambro](#)

How do your financial professionals make money?

Non-partners are salaried and participate in a discretionary bonus scheme which is linked to the firm's profitability and individual performance and conduct. Partners take a fixed amount as monthly drawings and subject to profitability may be eligible for a variable bonus based on performance and conduct; residual profits are distributed to partners based on their partnership share.

Compensation is not linked to the value of client assets serviced, the time/complexity required to meet a client's needs, the product sold, product sales commissions or the revenue earned by the firm from the financial professional's advisory services or recommendations.

Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

No. There is nothing to disclose. Investor.gov/CRS is a search tool used to research the firm and its financial professionals.

Additional Information

For additional information about our services, or request a copy of the relationship summary by contacting telephone number +44 207 747 3500 or email address clientservices@jameshambro.com.

Who is my primary contact person?

Your appointed Portfolio Manager is your primary contact person and can be reached on the above telephone number.

Who can I talk to if I have concerns about how this person is treating me?

At all times, we seek to provide the highest standard of service to you, our client. However, we acknowledge that there may be occasions when we fall short of this. If we let you down, we want to hear from you. At such times, you can email compliance@jameshambro.com.